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August 6, 2021

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 8/9/2021

Re: *International Flight Resources, LLC v. Aufiero* (Case No. 1:21-CV-03029-VSB),  
Request for Leave to File Under Seal

Dear Judge Broderick:

The firm represents Defendants Wells Fargo & Co. and Wells Fargo Merchant Services, LLC (collectively, “Wells Fargo”) in the above-captioned action. Pursuant to Rule 5(b)(ii) and 5(b)(iii) of Your Honor’s Individual Rules & Practices in Civil Cases, Wells Fargo submits this letter motion seeking leave to file certain documents under seal. Specifically, Wells Fargo respectfully requests permission to redact the highlighted portions of Exhibit 1 to Katherine Garland’s Declaration in Support of Wells Fargo’s Reply in Support of its Motion to Dismiss, and the Reply Memorandum of Law in Support of Wells Fargo’s Motion to Dismiss (collectively, the “Reply Submissions”).

The Reply Submissions contain highly sensitive and confidential information, including the terms of a Settlement Agreement that is subject to a confidentiality provision. The submissions likewise include non-public, business information reflecting Wells Fargo’s debt negotiation and settlement strategy. This information is either identical to, or substantially similar to, information that this Court has previously permitted Wells Fargo to file under seal in connection with its Motion to Dismiss. *See, e.g.*, ECF No. 37 (granting Wells Fargo’s prior motion to seal).

For the foregoing reasons, Wells Fargo respectfully requests that the Court permit Wells Fargo to redact certain Settlement Agreement terms contained within the Reply Submissions.

Respectfully submitted,

/s/ Katherine A. Garland

August 3, 2021  
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